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December 20, 2018

BY ECF AND HAND DELIVERY

The Honorable Denise L. Cote  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1910  
New York, NY 10007

Re: *In re Tribune Co. Fraudulent Conveyance Litig.*,  
Case No. 11-md-2296 (DLC); *Kirschner v. Citigroup*  
*Global Markets Inc.*, Case No. 12-cv-6055 (DLC)

Dear Judge Cote:

This firm is co-counsel to Plaintiff Marc S. Kirschner, Litigation Trustee for the Tribune Litigation Trust (the "Trustee"), in the actions that were consolidated in the multidistrict litigation, *In re Tribune Co. Fraudulent Conveyance Litig.*, Case No. 11-md-2296 (DLC) (the "MDL"), and sole counsel to the Trustee in *Kirschner v. Citigroup Global Markets Inc.*, Case No. 12-cv-6055 (DLC) (the "*Citigroup* Action"). Pursuant to the Court's Order dated December 19, 2018, enclosed please find one unredacted courtesy copy of the operative First Amended Complaint in the *Citigroup* Action, dated August 1, 2013, which was filed under seal. Our co-counsel in the MDL, Akin Gump Strauss Hauer & Feld LLP, will provide the requested courtesy copies of the other pleadings in the MDL.

Respectfully,

s/ Robert J. Lack  
Robert J. Lack

cc: All counsel of record (*via ECF; without enclosure*)